



Deposition of:
CONF Navendu Sharma

August 27, 2019

In the Matter of:
**Bartley, Laelonnie Vs. Blackwell's
Automobile Leasing Co., LLC, Et Al.**

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1 MR. BRANTLEY: Object to the form of the
2 question.

3 A I would not be able to answer what they -- what end
4 customers would say. What I've said before is
5 Sullair's goal is to provide a safe operating
6 machine for the purposes of what customer is going
7 to use the machine for.

8 Q So the subject trailer or compressor, as referenced
9 in Exhibit 22, it comes with standard highway
10 towable running gear; correct?

11 A Yes.

12 Q And comes with optional brakes; correct?

13 A Correct.

14 Q Is there any sort of benefit that Sullair received
15 by making the trailer -- or having the compressor
16 have highway towable running gear as a standard
17 feature, but brakes as an option?

18 MR. BRANTLEY: Object to the form of the
19 question.

20 A The way I see it is it's a benefit to the customer
21 to be able to pick and choose the options and
22 features they want and they like, and they can use
23 the compressor for the purpose that they are trying
24 to buy the machine for.

25 Q So what benefit, other than just sort of the

1 Q So I think -- I'm not sure we finished this
2 discussion. I'll just ask it and see.

3 It's my understanding that in the Tier 3
4 design, brakes were an optional feature, correct,
5 of the 375 family?

6 A Yes, correct.

7 Q The Tier 3 900 family, those had brakes as a
8 standard feature; correct?

9 A I will have to go back and check.

10 Q They do.

11 Do you know why brakes were a standard feature
12 on the 900 family of compressors in 2012 but they
13 weren't for the 375 family in 2012?

14 MR. BRANTLEY: Object to the form.

15 A I cannot answer that. I do not know basically.
16 That's what --

17 Q Just want to make sure that I've got this. I'm
18 looking at Exhibit 22, and there's a little X here
19 by the highway towable running gear.

20 So is it correct to say that in this exhibit,
21 which is the 2012 sales brochure for the subject
22 compressor, that Sullair advertised that the
23 compressor had standard equipment described as
24 highway towable running gear?

25 A Yes.